

# MASTER AUDIT PROGRAM

<b>Activity Code 11015</b>	<b>Testing of Paid Vouchers</b>
<b>B-1 Planning Considerations</b>	<b>Version 6.0, dated July 2020</b>

<b>Type of Service - Attestation Examination Engagement</b>
<b>Audit Specific Independence Determination</b>
Members of the audit team and internal specialists consulting on this audit must complete the Audit Specific Independence Determination (WP 34) prior to starting any work on this assignment. <i>(Note: Because staff is sometimes added to on-going audits, supervisors should ensure that all individuals who are directing, performing audit procedures, or reporting on this audit as a member of the audit team who are performing as a consultant have signed this working paper. For example, an FAO may add additional auditors (e.g., technical specialists) to the audit assignment or may need to consult with an internal specialist (e.g., industrial engineers, and operations research specialists) as the audit progresses.)</i>

<b>Purpose and Scope</b>
1. The purpose of this assignment is to perform limited current period tests on selected paid vouchers. This assignment was designed to verify that cost billed to auditable Government contracts are allowable, allocable, and reasonable in accordance with contract terms, applicable generally accepted accounting principles, cost accounting standards and Government acquisition regulations. We will also use the results of the testing to support the incurred cost audit for the fiscal year in which the voucher was audited.
2. The testing should be based on a review of paid vouchers that DCAA already sampled, reviewed, and approved for pre-payment using the risk-based approach. Auditors are not required to perform the interim voucher review procedures described in CAM 6-1005 as part of this assignment.
3. The scope of the testing is limited to the costs incurred in the current billing period, not the cumulative billing cost.
4. Post-payment testing will be performed on at least one interim voucher per year for nonmajor contractors, and at least one interim voucher per quarter for major contractors. FAOs should consider if it is necessary to review additional vouchers based on their knowledge of the contractor's billing history (i.e., history of rejected vouchers or improper/over payment). If risk factors warrant additional testing, the FAO should expand testing beyond the minimum. FAOs may also use the results of the post-payment testing as part of the assessment on whether or not the contractor should remain in the low-risk pool. FAO should not wait until the end of the year or quarter to perform this assignment.
5. The paid voucher evaluation procedures apply to all contractors submitting interim vouchers for review including those not using Wide Area Workflow.

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### Other Planning Considerations

Prior to commencing the audit, review Agency guidance that may impact the audit and adjust the scope and procedures appropriately.

Since real-time assignments, Labor Floorcheck/Interviews (MAAR 6) and Purchase Existence and Consumption (MAAR 13), could be performed simultaneously or have some overlap in the timing of the procedures to be performed, this needs to be considered and documented in the risk assessment of this audit. The risk assessment should document the basis for performing less testing, such as when the current labor and/or materials costs were part of the floorcheck and/or purchase existence and consumption audit and the results of that testing can be relied on to limit the testing in this audit. However, if the current billings were not included in the universe of the floorcheck and/or purchase existence and consumption audit, then significant labor and/or materials costs should be evaluated for existence and if required by the contract. If a floorcheck and/or purchase existence and consumption audit is being performed concurrently with the postpayment audit, the testing can be performed in those audits and the risk assessment for this audit will document this decision

### References

1. CAM 6-1000, Responsibilities for Processing and Approval of Interim and Completion Cost Reimbursement Vouchers
2. CAM 6-1006, Testing of Paid Vouchers (Post-payment Audit)
3. FAR 52.216-7, Allowable Cost and Payment
4. FAR 4.703, Contractor Record Retention

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<b>B-1 Preliminary Steps</b>	<b>WP Reference</b>
<b>Version 6.0, dated July 2020</b>	
1. Review the FAO permanent files including prior audits of the contractor's billing system, review of interim public vouchers, audit leads, MAARs Control Log and prior relevant audits to identify areas of high risk.	
<p>2. Review permanent file to determine if previous audits included findings and recommendations that relate to the subject matter. If there were findings material to the subject matter, document this information in the risk assessment and perform the following procedures:</p> <ul style="list-style-type: none"> <li>a. Ask contractor management if corrective actions were taken to address findings and recommendations reported in previous DCAA audits (e.g., questioned costs, business system deficiencies, CAS audits) that are relevant to the subject matter of audit. (GAGAS 7.13) If yes, have contractor explain corrective actions taken and determine if additional audit procedures should be included in the fieldwork to test the corrective actions.</li> <li>b. Document the results of the inquiry and the impact of the corrective actions to the subject matter.</li> </ul>	

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<b>B-1 Preliminary Steps</b>	<b>WP Reference</b>
<p>3. Review permanent file to determine if the contractor has previously provided other studies or audits (e.g., summary listing of internal audits or external audit reports) that directly relate to the subject matter. If there are no other studies or audits, document that information in the working papers and perform the procedures below.</p> <ul style="list-style-type: none"><li>a. Ask contractor management if internal audits were performed. If yes, request contractor provide a summary listing of the internal audits that would assist us in understanding and evaluating the efficacy of the internal controls relevant to the subject matter of the audit.</li><li>b. If the review of the perm file or the contractor identifies relevant internal audits:<ul style="list-style-type: none"><li>• Determine if access to these reports is necessary to complete the evaluation of the relevant internal controls to support the risk assessment or audit procedures related to the subject matter of the audit. There must be a nexus between the internal audit reports and the scope of this specific assignment.</li><li>• Document the results of the determination in writing.</li><li>• If assignment is at a major contractor location, coordinate with the CAD or FAO point of contact (POC) for internal audit reports to request the contractor provide access to the reports.</li><li>• If assignment is at a non-major contractor and the FAO does not have a designated POC, the auditor should request the contractor provide access to the internal audit reports.</li><li>• The request should include information on how the internal audit report is relevant to the DCAA audit. Place a copy of the request in the assignment administrative working papers.</li></ul></li><li>c. If the review of the perm file or the contractor identifies relevant other audits or studies:<ul style="list-style-type: none"><li>• Obtain publicly available information for the relevant other Government agency audits (e.g., websites for DoD IG or other IGs, service audit agencies, etc.).</li><li>• Make appropriate adjustments to your risk assessment and planned procedures based on the reported findings.</li></ul></li><li>d. Document the results of the inquiries including the response received from the contractor for any request for access to internal audit reports. (If access was not granted this should include the contractor's rationale or justification for not granting access).</li><li>e. Determine if additional audit procedures are needed to address any identified risk.</li></ul>	

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<b>B-1 Preliminary Steps</b>	<b>WP Reference</b>
4. Contact the Administrative Contracting Officer to notify them of the commencement of audit. Discuss any significant concerns or other information that the contracting officer may have relevant to the audit that will impact the audit and adjust the audit scope and procedures accordingly.	
5. Notify the appropriate contracting officer of the commencement of the risk assessment and that the expected completion date will be provided in the formal acknowledgement once the risk assessment is complete. The acknowledgement process should be performed in accordance with CAM 4-104.	
6. Arrange and conduct an entrance conference in accordance with CAM 4-302.1.	
7. Follow up with contractor management on corrective actions that address previous DCAA audit findings and recommendations.	
8. Follow up with contractor management regarding other studies or audits (e.g., internal auditors, consultants, Independent Public Accountants) that impact the subject matter.	
9. Using the universe of interim public vouchers selected for pre-payment testing based on the risk assessment/sampling plan for high-risk contractors and standard parameters for low-risk contractors, judgmentally select a sufficient number of vouchers for additional procedures.	
10. For the vouchers selected, review the contract brief / contract for any special contract provisions / limitations. Adjust scope accordingly.	
11. Using the framework and the guidelines in WP B-2, obtain and document an understanding of the contractor's key internal controls that are relevant to the audit. Auditors should be able to obtain a major portion of this understanding during a walkthrough of the contractor's assertion.	

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<b>B-1 Preliminary Steps</b>	<b>WP Reference</b>
<p>12. During the entrance conference, or other appropriate meeting, make specific inquiries of contractor management and other appropriate parties regarding the following:</p> <ul style="list-style-type: none"><li>a. Their knowledge of any actual, suspected, or alleged fraud or noncompliance with laws and regulations affecting the period of time corresponding to the subject matter under audit. (AT-C 205.32)</li><li>b. Whether any investigations or legal proceedings, that are significant to the engagement objectives, have been initiated or are in process with respect to the period of time corresponding to the subject matter. (GAGAS 7.14)</li><li>c. The existence of other audits and studies (performed by other than DCAA) that relate to the subject matter under audit. If yes, have the contractor explain the audits and studies performed, any related findings or recommendations, and any contractor corrective actions taken. (GAGAS 7.13)</li></ul> <p><i>Note: Specifically document in the working papers; the inquiries and the corresponding responses as well as how the responses affect the performance of the engagement.</i></p>	

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B-1 Preliminary Steps	WP Reference
<p>13. Based on the team's understanding of the criteria, subject matter, and the contractor and its environment, hold a planning meeting with the audit team (at a minimum, Supervisor and Auditor) to discuss and identify potential material noncompliances, whether due to error or fraud, that could affect the subject matter. The discussion should include:</p> <ul style="list-style-type: none"> <li>• relevant prior audit experience (e.g., questioned cost, relevant reported estimating or accounting system deficiencies),</li> <li>• relevant aspects of the contractor and its environment,</li> <li>• risk of material noncompliance due to fraud (e.g., the extent of financial incentives, pressures to meet budget or contractual commitments, and opportunities to commit and conceal fraud). Consider the DoD IG website <a href="#">Fraud Detection Resources for Auditors</a> for common fraud risk factors. Copy link and paste into web browser,</li> <li>• other factors identified that increase the risk of material noncompliance with laws and regulations, and</li> <li>• the audit team's understanding of relevant key internal controls. Document the factors identified that increase the risk of material noncompliance due to error or fraud that could affect the subject matter, and design audit procedures to respond to the increased risk of material noncompliance.</li> </ul> <p>Communication among audit team members should continue as needed throughout the audit regarding the risk of material misstatement and noncompliance due to error or fraud.</p>	
<p>14. Issue a notification letter to the contractor regarding the audit in accordance with CAM 4-302.3.</p>	
<p>15. Issue a final acknowledgement memorandum to the contracting office to communicate the audit scope and expected completion date.</p>	

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<b>C-1 Testing of Paid Vouchers</b>	<b>WP Reference</b>
<b>Version 6.0 dated July 2020</b>	
1. Verify that the contractor is not delinquent in the payment of cost incurred in the performance of the contract in the ordinary course of business.	
a. Review the contractor's aging of accounts payable schedule. Discuss any significant amounts over 30 days old with the contractor.	
b. Select a minimum number of items charged direct to the contract and trace the amounts from vouchers to evidence of payment. If the contractor is delinquent in paying costs in the ordinary course of business, the costs are not reimbursable in accordance with FAR 52.216-7(b) Reimbursing costs.	
2. Verify Labor Amounts Billed:	
a. Select labor charges billed direct to the contract and trace the amounts from vouchers to timecard/time keeping system detail.	
b. Make inquiries of employees to confirm their time charges.	
c. Verify direct labor charges are consistent with the contract requirements (statement of work).	
3. Verify Other Direct Cost (ODC) Amounts Billed:	
a. Based on the assessed risk, select ODC charges billed direct to the contract and trace the amounts from voucher(s) to the accounting records and supporting documentation.	
b. Review supporting documentation for indications of significant unallowable or unreasonable cost.	
4. Review the cost elements in the standard form (SF) 1034 and supporting 1035 (or equivalent) to identify any unusual items that might warrant additional review (e.g., items outside the scope of the contract, indirect costs billed direct, credits, etc.). If this analysis discloses unusual items, discuss with the contractor to gain an understanding of the nature of the cost. Depending on the significance/sensitivity of the item, testing to source documents may be necessary keeping in mind that evidence from source documents is usually more reliable than testimonial evidence from contractor personnel.	

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C-1 Testing of Paid Vouchers	WP Reference
<p>5. Time-and-Material or Labor-Hour contracts. Selectively verify that labor is billed at contract rates, and subcontracts are billed at cost or separate rates in accordance with contract terms. Compare employee qualifications to those specified in the contract. If the employees do not meet the qualifications specified in the contract, the auditor should contact the contracting officer to determine if specific authorization has been or will be given in accordance with FAR 52.232-7(a)(3)). (14PPD-008(R)).</p>	
<p>6. Verify Materials Costs Billed.</p>	
<p>a. Select billed direct material charges and trace the amounts from voucher(s) to the accounting records and supporting documentation.</p>	
<p>b. Review supporting documentation for significant unallowable or unreasonable cost.</p>	
<p>c. Verify material costs billed meet the contract requirements.</p>	
<p>7. Compare amounts billed to amounts received on the contractor's records (bank statements, electronic funds transfer, etc.) for each voucher, and when the amounts differ, determine if appropriate notifications were made to the paying office.</p>	
<p>a. If amounts received are greater than amounts billed, the contractor should refund the difference to the paying office or offset against a subsequent billing on the same contract within 30 days.</p>	
<p>b. If the contractor determines that an offset, instead of a refund, is appropriate, the buying office or the paying office, normally DFAS, should be notified. Verify that offsets are properly authorized, and the authorization is documented by the paying office.</p>	
<p>c. If a significant overpayment to the contractor is found (\$50 thousand on a single issue or on an individual contract), and (1) the contractor has not notified the Government, and (2) the overpayment is over 30 days old and has not been returned, immediately notify the paying office using the "Proforma Notification to Payment Office" memorandum (WP 31i). If the overpayment is not significant, include the issue in the memorandum as part of the Concluding Steps (see WP A-01, step 7).</p>	
<p>d. If the amounts paid to the contractor are less than amounts billed, coordinate the differences with the contracting officer, the contract administration office, or the paying office, as applicable, to resolve the differences.</p>	
<p>8. If public voucher(s) include subcontract payments, verify that the contractor is monitoring subcontractor billings, including:</p>	

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C-1 Testing of Paid Vouchers	WP Reference
<p>a. Coordinate with the contractor to understand the controls implemented to manage its subcontracts and verify that the contractor is monitoring subcontract billings as required by FAR 42.202(e)(2) by performing activities similar to that done by a government contracting officer's representative (COR) (i.e., the billings from the subcontractor are consistent with the scope work performed, an analysis of the allowability of the costs on the subcontract billing, subcontractor billing rates are updated timely to reflect year-end actual allowable rates, resolving any subcontractor overpayments timely).</p>	
<p>b. If the contractor receives accelerated payments, determine if accelerated payments are made to small business subcontractors in accordance with FAR 52.232-40.</p>	
<p>c. Request specific assistance from cognizant DCAA office(s), as applicable, for major subcontractor amounts.</p>	
<p>9. Summarize the results of the fieldwork and document any improper or overpayments and potential noncompliances.</p>	

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A-1 Concluding Steps	WP Reference
<b>Version 6.0, dated July 2020</b>	
1. Summarize the results of testing.	
2. Discuss the results with the supervisor.	
3. Discuss the results with the Administrative Contracting Officer/Buying Command.	
4. Conduct an exit conference in accordance with CAM 4-304. If the audit discloses costs that are not in accordance with contract terms, coordinate with the contractor to submit an adjustment voucher. If the contractor does not agree to submit an adjustment voucher to deduct the costs from current billings, issue a DCAA Form 1 in accordance with CAM 6-900 to suspend the cost and recover the overpayment.	
5. Prepare a Memorandum for Record documenting the results for incorporation in the future incurred cost audit.	
6. If the testing of paid vouchers discloses potential deficiencies with the contractor's billing practices, establish an audit lead to ensure the appropriate additional audit effort is performed in a (11090) business system deficiency assignment. The FAO should set up the 11090 assignment in a timely manner to confirm whether or not a deficiency exists, and should use the results of this assignment as part of the assessment.	
7. Notify the paying office and contracting officer, via memorandum, of any unresolved overpayments by the paying office, improper offsets of overpayment by the contractor, underpayments that have not yet been resolved by the contractor or paying office, and subcontract overpayments included in billings to the Government that have not yet been returned by the contractor. The Proforma Notification to Payment Office memorandum (working paper 31) should be addressed to the paying office. If the paying office is DFAS, send to the DCAA DFAS Financial Liaison Advisor to be delivered to DFAS. Provide a copy of the memorandum to the ACO.	
8. Complete the administrative working papers.	
9. Update the permanent files.	
10. Submit the working paper package to the supervisor/manager for final review and processing.	